

## **Council Response to Inspector's Procedural Letter 2**

### **Housing Trajectory and London Plan**

***The matter of housing will clearly be one for further examination at any Hearing sessions. Whilst I am mindful of the Housing background paper and the referenced evidence, I would appreciate your clarification of the relationship between the Council's submitted Plan (including HO1 et al) and the London Plan in light of the comments from the GLA on the post-2025 housing trajectory, London Plan Policies 3.3 and 3.8 (see Rep ID 486) and the identification of housing needs.***

Policy 3.3D of the London Plan states that "Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1, and if a target beyond 2025 is required, roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target".

Table 2 of the Local Plan (KD1) outlines the council's indicative housing targets which seek to exceed the 1,031 per annum target shown in Table 3.1 of the London Plan (SD68). In particular, the council have projected a total of 2,600 new homes per year in the period 2015-2025. This annual target has been welcomed by the GLA. However, the GLA comments in rep ID486 have queried the indicative housing target for the period 2015-2035 which they say is much lower (940 new homes per annum) than the London Plan target. The GLA feel this is going against the advice of the London Plan policy 3.3D. For the GLA representation to make sense, the council assume that they are querying the annual housing figure of the plan between the latter stages, 2025-2035 which would add up to an average of 920 homes per year ( $5,200 + 4,000 = 9,200 / 10 = 920$ ) rather than 2015-2025 which would work out to be 1,110 homes per year.

The council have proposed minor changes to Table 2 of the Local Plan in it's minor changes schedule (KD4). These are also shown in the housing trajectory (SD14). The proposed minor changes project an average figure of 1,026 new homes per year from 2025 -2035. The council acknowledge that this average annual figure for the period post 2025 is lower than the 1,031 annual target set in the London Plan. However, on the basis that this figure is only marginally lower, and that the average for the plan period is 1,100 homes per year, the council consider that the housing targets in table 2 of the Local Plan are in general conformity with the London Plan and in particular the advice in Policy 3.3D.

The council are also mindful of the supporting text of London Plan Policy 3.3 that states that boroughs should express the rolling target past 2025 as an indicative figure to be checked and adjusted against any revised housing targets. In accordance with this, the council will continue to

monitor the housing supply figures in its annual monitoring reports and work collaboratively with the GLA on the London SHLAA 2017, to ensure that the London Plan can deliver as many additional homes each year as is practicable.

With regard to the second part of the GLA's representation (ID486) on housing need and London Plan Policy 3.8 please see the council's response below.

### **Strategic Housing Market Assessment (SHMA)**

***I have noted the Council's 2016 SHMA but, with regard to national planning guidance (PPG) and the Duty to Cooperate, I am not currently clear as to the methodology used for its production. Furthermore, I am currently uncertain as to what any locally defined housing market area may consist of and how the Council's SHMA contributes to the housing needs/requirement of the Borough and how it ultimately relates to the housing policies of the submitted Plan and the London Plan. Can you provide further clarity on these matters?***

The SHMA has been developed in accordance with the NPPF's objectives of 'delivering a wide choice of high quality homes'. The PPG's set out that the primary objective of the housing needs assessment is to:

- identify the future quantity of housing needed, including a breakdown by type, tenure and size

To meet the above objective, a housing needs assessment is required. It is relevant to outline the context in which the council's SHMA has been produced and outline the London planning framework. The London planning framework consists of two tiers, each borough is covered by a spatial development strategy- the London Plan, and at borough level by a Local Plan and other development plan documents. Duplication between the documents is considered unnecessary.

The Further Alterations to the London Plan (FALP) (2015) incorporated a revised evidence base including the London-wide SHMA and the SHLAA. One of the conclusions from the SHMA is that London is a single housing market area which Hammersmith and Fulham falls within. The London-wide SHMA and SHLAA produced the objectively assessed need (OAN) figure for London, which resulted in strategic housing policies to address need and housing targets for each London borough. The London Plan further outlines that there will be further localised HMA's, that may require boroughs to work together to identify how local/sub-regional and strategic housing needs can be met.

The council's SHMA therefore has been produced in this context with the London Plan setting the strategic context for housing need in the borough, which has been translated into the plan establishing the annual housing target. The council's SHMA goes into more detail at the borough level housing needs and emerging trends across all sectors.

In identifying the housing market area (HMA), the council started with the PPG's definition: 'a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.' The PPG's identify the following factors as some of the matters in defining the HMA:

- House prices and dates of change in house prices
- Household migration and search patterns
- Contextual data (including travel to work areas)

Initially, the council used the 2007 CLG Report on the Geography of Housing Market Areas which identified LBHF as being within the London (West) Housing Market Area. Guidance from PAS identified that single tier market areas are the most useful for housing needs studies. The council also considered that in order to meet national and regional objectives, an assessment of the borough was required to provide clear evidence for the production of the Local Plan. The discussion regarding Duty to Cooperate on this matter can be found in the Duty to Cooperate statement (KD6). The boundary was tested in relation to the factors listed above, which corroborated that LBHF is a single HMA with three sub-market areas: broadly, the north which has the highest concentration of social housing, the central area which has the highest percentage of properties in the private rented sector (37%) and the south which has the highest proportion of owner occupied properties (42%), which is illustrated at p. 13 of the SHMA.

In terms of live/work data: the SHMA identified there to be the strongest commuting links to Westminster and the City of London (32% of residents) Kensington & Chelsea (9.4% of residents) and, however it also showed 20% of residents work in the borough (p. 19).

In relation to the quantum of housing need, the PPG's define housing need as the 'scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area.' To satisfy national and London plan requirements: the London Plan provides the overarching strategic London wide need and the local needs assessment should provide targets for the mix of tenure, type and size of homes needed within this target. The London Plan policy 3.8 Housing Choice outlines how boroughs should take account of this strategic policy.

The council's assessment of housing need follows the PPG's guidance by starting with the household projections. The PPG's state that: household projections are trend based, and would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. The council's SHMA assessed both the GLA household long-term and short-term migration scenarios. The GLA long term migration trends identify a growth of 844 homes per annum, whereas the short term projections identify a figure of 737 households per annum. From analysis of household completion rates, council tax records

and the council's previous SHMA's it shows that the borough has kept pace with the projected increases in the borough therefore the projections have been realised in practice and the long term projection figure is the most appropriate. This figure is considered proportionate to local need, being a reasonable scenario that is likely to occur and be compliant with national and regional policy. It is important to note that in relation to the affordable housing needs in the borough this is considered an appropriate overall need figure for the borough.

Out of the GLA household projections figure of 844 houses, 283 are identified for affordable social housing per year. The 2013 London SHMA recognises that 32% of the net annualised housing requirement will be for social rent housing and 20% will be for intermediate housing (for example, shared ownership homes). The document however does not provide any estimates of requirements at a local level. The initial findings from the SHMA regarding house prices and income analysis showed that, on the assumption that new emerging households will have similar income profiles of current households there is a high need for intermediate housing. Out of the market housing apportionment, based on the council's SHMA's findings there is a greater need for intermediate housing to be delivered above market housing. The council's SHMA found that even if the 50% affordable housing target is met (out of the annual target), the estimated affordable housing demand would not be met.

In terms of assessing the social rent and intermediate housing sectors, as a starting point affordability was measured using the ratio between the lower quartile income and lower quartile house prices. Affordability in the private rented sector examined the ratio between annualised income and annualised private rent levels for those people who live in the borough. Analysis of the land values, house values and rents have identified discrepancies between these social rent and intermediate housing making it difficult to establish an overall affordable housing borough wide need figure. This is partially due to the amount of existing social rented properties there are in the borough, the high need for intermediate housing and the growing private rented sector accommodating for the lack of affordability on the private housing market.

In order to identify those in current housing need, the council applied the PPG's by identifying households considered in affordable housing need using LBHF data and homeless data (the demand) against the turnover of social rented housing stock in the borough between the years 2010-16 (supply), which identified that 283 new social housing units are required per year to clear the current need. A higher figure would be required for emerging households expected to be in housing need. A breakdown of the model can be seen at p. 90 of the council's SHMA (SD12).

Estimating demand for intermediate housing has been derived by using Census data and the council's HomeBuy Register. The trend between the 2001 and 2011 Census data has shown a decrease in home ownership/owner occupiers, this difference in home ownership is likely to now be in the private rented sector, approximately 8.4% of all households.

The HomeBuy register includes 9,077 individuals (as of Sept. 2016) seeking households who either live or work in the borough. Approximately 67% of those on the register would be eligible to purchase or rent intermediate housing (this calculation is made by removing those earning under £20,000 per annum and those earning £80,000 or higher and may be able to purchase a house on the open market). As a result, there is approximately 1,529 newly forming households per annum that would require affordable housing, but not social rented accommodation. This therefore equates to approximately 2, 104 new intermediate units required per year to meet demand.

The SHMA has identified the lack of affordability in the borough preventing new buyers accessing the private housing market. As a result and is seen across London, there is a growing rental sector where those previously would have purchased housing are now living in rental accommodation. Many of these groups are therefore being accommodated on the private housing market as properties are bought for rent. The average rents in Hammersmith and Fulham equate to 47.2% of the average income of households.

The assessment of specific housing needs is outlined in the SHMA and feeds into the Local Plan policies (more detail below).

Relationship to the submitted Local Plan policies:  
HO1 Housing Supply

This policy outlines the council's annual housing target, identifying how this figure will be met and the means to which the council will seek to go above it. The council's SHMA identifies a figure of 844 homes per year to meet local demand, the 1,031 target is therefore an uplift from the council's need figure and identifies how LBHF will be meeting local and strategic London housing needs. This policy also seeks to encourage properties to be occupied as the SHMA found there are high vacancy levels in the borough.

#### HO2 Housing Conversion and Retention

This policy promotes the conversion of properties to increase housing supply and to encourage family sized housing. The SHMA identified that:

- there is a growing 'single' and 'couple with no children' population of working age;
- the borough has a high proportion of properties converted in flats;
- occupancy rates are highest in the private and social rented sectors; and
- the borough has a smaller/low proportion of family sized housing across all house sizes.

This policy seeks to address some of the findings above. The significance of the age group suggests that the borough is attractive to young couples and single residents that are likely to be living in private rented accommodation. The increase in conversions aligns with the increasing private rental sector

in the borough. There is a need to ensure conversions meet the London Plan housing standards, retain some units as 2 bedroom properties and mitigate any high street parking impacts that may occur from the increase in units.

The lack of larger family sized units in the borough has resulted in support of de-conversions of smaller flats to larger units suitable for family accommodation. This also supports the London Plan which identifies the supply of family housing, a strategic matter for boroughs to deal with.

### HO3 Affordable Housing

This policy sets out the council's affordable housing policy to address local and where possible, strategic London-wide affordable housing needs. The council's SHMA has identified a high affordable housing need in the borough, correlating with the London's SHMA. The council's SHMA found:

- lower quartile house prices were 19 times higher than the lower quartile earnings;
- affordable housing supply in recent years has not met demand;
- the Housing Needs Register is increasing with long waiting times;
- overcrowding and occupancy rates are highest in the social and private rented sectors.

In response to the above, HO3 seeks to address some of these issues and to boost affordable housing supply in the borough. The policy seeks 50% affordable housing, subject to viability, with the objective of identifying the high affordable housing need in the borough and boosting supply. The 50% affordable housing target is a pragmatic policy response to a growing issue in the borough. In an area with high land values and house prices, affordable housing will only be delivered as a proportion of market housing therefore the council's best response to tackling this issue is to implement a 50% affordable housing target.

The proposed tenure split: 60% social/affordable rent and 40% intermediate housing reflects the council's aim of creating greater choice for those in acute housing need (those facing homelessness and overcrowding in current housing) as well as seeking to retain and attract those of working age to be able to get onto the housing ladder through intermediate housing products. The council also proposes a higher social/affordable rent to prioritise those in immediate housing need.

In relation to the London Plan, increasing affordable housing supply meets the strategic objectives and targets. The affordable housing tenure mix is also in accordance with London Plan policy 3.11. The council's HomeBuy register is also available for those that live and work in the borough and therefore is supporting London-wide housing needs.

### HO5 Housing Mix

The council's SHMA has identified the following:

- current social rented housing stock is predominantly 1 bed properties (46%);
- highest occupancy levels and overcrowding are found in the social rented sectors, 17% of all properties are overcrowded by at least one bedroom;
- occupants in the social rented housing are more likely to have multiple generations in one household;
- the number of households in Temporary Accommodation has increased by 32% from 2009/10 to 2014/15.

The Housing Mix policy seeks to address the housing needs and to diversify new housing stock in the borough. The SHMA shows overcrowding is highest in social rent and intermediate housing. The policy includes flexibility in terms of the housing mix with regard to viability recognising that larger units are likely to incur higher costs to developers. For these reasons, market housing is not subject to a mix and should provide a variety of house sizes and units to all members of the community.

#### HO7 Meeting Needs of People who Need Care and Support

The council's SHMA has identified that:

- between 2015-2025, significant growth is expected to occur at ages 85 and over;
- the majority of older people's housing is run by the local authority or Housing Associations.

In order to support the supply of older people's housing in the borough this policy identifies the criteria to which applications will be granted permission.

#### HO9 Student Accommodation

The council's SHMA found that:

- there has been an increase in students between 2012/13 and 2014/15;
- there has been an increase of 576 students living alone from 2001 and 2011; and
- the numbers living in all student households has increased.

The council's policy supports student accommodation to meet London-wide needs. It aligns with London Plan policy supporting it in where it is proposed as part of a mixed use development schemes in the key Opportunity Areas.

### **Strategic Housing Land Availability Assessment (SHLAA)**

***In addition, can you confirm what SHLAA data the Council relies upon?***

The council relies on the London Strategic Housing Land Availability Assessment 2013 (SD70). The council collaborated with the GLA to

produce the London Strategic Housing Land Availability Assessment (SHLAA) 2013. This document informed the Further Alterations to the London Plan (FALP) and the consolidated London Plan 2016 (SD68), which set borough's individual minimum housing targets for each London Borough. The collaboration of all London planning authorities on a single London SHLAA removes the need for each authority to prepare an individual SHLAA for its own area. This process has ensured mutual agreement on the minimum housing target as set out in the London Plan.

To supplement the London SHLAA, the council's 5 year Housing supply (SD13) has been reviewed regularly to make sure the pipeline of housing is updated with planning permissions and completions. This data has also been used to inform the council's housing trajectory (SD14).

### **Housing White Paper**

***Does the Council consider the recent Housing White Paper<sup>1</sup> to have any implications for the content of the submitted plan? (If so, please specify.)***

The council are currently preparing a response to the Housing White Paper. As an initial assessment the council is aware that there may be implications for the Local Plan however no firm conclusions can be made yet. At this stage, some of the issues could be:

- the allocation of small sites;
- change in housing need assessment.

The White Paper is seeking to encourage more land to come forward through Local Plans and therefore to allocate small sites in authorities' Local Plans. The council has not allocated small sites in the plan and instead has a windfall figure.

The White Paper also refers to a further consultation on bringing into place a standardised housing needs assessment methodology. The council's annual housing target is set by the London Plan based on the London-wide SHMA and SHLAA. The council is aware that this may impact upon the council's housing target in due course.

The council is also aware that the White Paper will have other implications in terms of the Duty to Cooperate, the introduction of 'consequences' upon delivery and others. However, these may not necessarily impact the Local Plan. At present, it is unclear whether there will be a transition period when these measures are brought into force and what the changes will look like following the consultation. The council is willing to discuss this further with the Inspector.

### **Gypsy and Traveller Accommodation**

***Once again I have noted the background paper and supporting evidence for Policy HO10. However, your clarification as to what***

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<sup>1</sup> 'Fixing our broken housing market' Feb 2017



***regard has been had to national guidance in assessing the level of accommodation needs would be appreciated. At present it would appear that the focus of the Council's work (in conjunction with a neighbouring Borough) has been on the existing site provision (Westway/Stable Way) and its occupants. I am currently unclear as to how the Council has considered in detail any existing and future needs which may arise from travellers living in bricks and mortar, from new household formations and particularly from migration. How has the Duty to Cooperate, beyond the Royal Borough of Kensington and Chelsea, been exercised in this latter regard? Does the Council have data relating to relevant ethnic groups? How have the needs of travelling showpeople been considered?***

In preparing the Gypsy and Traveller Accommodation Needs Assessment (GTANA), the authorities used the NPPF, and the Planning Policy for Traveller Sites (PPTS) as the basis of the housing needs assessment. Paragraph 50 of the NPPF sets out that authorities should 'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.' The PPTS specifically deals with planning for travellers in terms of plan-making and development management decisions. It outlines that authorities should make their own assessment of need, develop fair and effective strategies and plan for sites over a reasonable timescale. Both authorities (LBHF and Kensington and Chelsea) have sought to address the accommodation needs for the Gypsy and Irish Traveller community by using primary and secondary data to identify housing trends and future household need, using the planning definition of a Gypsy and or Irish Traveller outlined in the PPTS.

In terms of identifying future needs from Travellers living in bricks and mortar, from new household formations and from migration, the GTANA includes a wide range of data sources to inform the overall assessment. The council is aware that there is a wider gypsy and traveller community residing in both boroughs outside of Stable Way. Across both boroughs, according to the 2011 Census, there are 336 individuals who identify as Gypsy or Irish Traveller (on or off of Stable Way), page 23 of the GTANA shows the distribution across both authorities.

The councils carefully considered the preparation of the surveys and ways to reach the wider community without infringing upon data protection and/or individual anonymity within the community. In terms of bricks and mortar housing, the councils contacted the Housing Allocations and Council Tax records teams to understand where households had moved from and to, which have informed the demand and supply model. These records do not necessarily identify all information, for example their previous address, however, where there was available information this has been included in the GTANA (p. 18 identifies the information on the Housing Register and p. 31 is the supply and demand model).

Furthermore, the first survey includes a question on future family housing needs, which does not specify whether the future housing needs come from

on or off Stable Way. Therefore, any survey respondents that did identify any future housing needs would have been included as arising demand in the assessment. This was also a way to broadly understand whether there are any immediate housing needs of those in bricks and mortar, by using the connections of those on Stable Way.

The councils undertook a range of consultation prior to and after the surveys were completed. The consultation events were advertised for all of the community, on and off Stable Way. Some of those in attendance lived off of the site and were made aware of the events and surveys. Both authorities were aware of the importance of data protection and ensuring the anonymity of individuals within the community. These were considered the most appropriate and proportionate.

In terms of migration, the authorities looked at Census information however there is a lack of data on traveller movements. The GTANA also takes account of enforcement records to identify whether there are any migration trends; the few incidences there have been do not indicate there are long term migration trends/patterns in the area.

In regard to the question on the Duty to Cooperate, the council has worked with other relevant partners on this matter. The council works closely with the OPDC. The council has made the Development Corporation aware of the conclusions of the joint study and the on-going work regarding site searches. From the survey, participants have identified areas located in the OPDC area. As part of working with the OPDC, the council is part of a wider project group which includes the OPDC, Ealing and Brent therefore these matters are discussed with all partners.

The council also assisted Hounslow with their Gypsy and Traveller Needs Assessment, identifying the issues facing the borough and whether the authority considers there to be any cross boundary issues. The council concluded that there were no cross boundary issues due to the distance between the existing Stable Way site and Hounslow. The council would consider boroughs in closer proximity to the existing community to be preferable.

The concern regarding the councils' assessment of Travelling Showpeople is noted. Neither boroughs are aware of any Travelling Showpeople. There is no Census data or any planning/enforcement cases to indicate a Travelling Showpeople presence in either borough. In this regard, the authorities have not considered Travelling Showpeople need where there is no existing population. In response to the question on data on ethnic groups, the councils have relied upon Census data.

### **Duty to Co-operate**

***With regard to the Council statement on the Duty to Cooperate (KD6), I believe there is an erroneous reference to Camden in para 4.16. Can you supply any further information and details on how Hammersmith and Fulham Borough Council has worked***

***constructively with all relevant prescribed bodies on strategic matters in the preparation of the Plan, for example, meetings and liaison both in relation to, and outside of, the regulatory processes that govern plan preparation? I note some additional reference to this issue is made within the Council's Monitoring Report. If necessary an addendum or revised version of KD6 may be appropriate.***

The council acknowledges the error made in paragraph 4.16 of the Duty to co-operate statement (KD6) which refers to Camden rather than Hammersmith and Fulham.

Further information and details on how Hammersmith and Fulham has worked constructively with all relevant prescribed bodies on strategic matters in the preparation of the Local Plan is provided in [Appendix 1](#) below. This includes details of meetings and liaison both in relation to, and outside of, the regulatory processes that govern plan preparation. If necessary the council would be happy to add this as an addendum to the Duty to cooperate Statement (KD6) or provide a revised version of KD6.

### **Habitats Regulation Assessment**

***I am interested to know whether the Plan has been screened adequately for likely significant effects on any European Wildlife (Natura 2000) sites. I note within the SA that the Council considers the Plan will not have a significant adverse impact upon the nearest SAC at Richmond Park. Can you point me to, or supply, any HRA Screening that has been undertaken?***

Directive 92/43/EEC (the Habitats Directive) on the Conservation of Natural Habitats and of Wild Fauna and Flora requires an Appropriate Assessment (AA) to be undertaken to assess the impacts of a land-use plan against the conservation objectives of any European Site(s) (or so-called Natura 2000 sites) and to ascertain whether it would adversely affect the integrity of that site. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects.

The SA for the Local Plan (KD8) has established that there are no 'European Sites' designated under the EC Habitats Directive within the London Borough of Hammersmith & Fulham, nor are there any immediately adjacent to its administrative boundaries. The nearest European Site is Richmond Park, a Special Area for Conservation (SAC), some 5 km to the south west of the borough, and the council consider that this site would not be significantly adversely impacted upon by any of the policies within the Local Plan. (For info on Richmond Park (SAC) see: <http://www.jncc.gov.uk/ProtectedSites/SACselection/sac.asp?EUCode=UK00302> 46).

The council received no adverse comments on its position in the SA regarding the Richmond Park (SAC). However, it is worth noting that

Natural England in its response to the Core Strategy 2011 (SD4) and Site Specific Allocations Preferred Options consultation (June 2007) suggested that an AA may be made in relation to two potential impacts on Richmond Park, namely 1) air pollution and 2) tourism impact. In respect to 1) the predominant winds are south easterlies and therefore away from Richmond Hill and there is not any identifiable pollution from the borough and 2) we do not promote Richmond Park as a tourist destination.

For the reasons above the council have not carried out any further screening of the Richmond Park (SAC) site. This approach to the HRA is consistent with that taken at the examination of the adopted Core Strategy and the Development Management Local Plan. Details of which can be found in the respective Inspector reports for these documents (SD51 and SD52).

### **Statutory procedures**

***As a general point, can you confirm that the Plan has been prepared in accordance with the statutory procedures of the 2004 Act (as amended) and the associated regulations, including in respect of the publication and availability of documents, advertisements and notification?***

The council considers that the Proposed Submission Local Plan (KD1) has been prepared in accordance with relevant legal requirements as set out in the Planning and Compulsory Purchase Act 2004 and associated Town and Country Planning Regulations as well as the council's Statement of Community Involvement (KD11).

The council has been assisted in reaching this conclusion by using the Planning Advisory Service (PAS) tool (SD10) to assess whether the Local Plan is legally compliant with the procedures set out in the Act and associated Regulations. The council considers that the documentation submitted to the Inspector reveals that these have all been met in terms of inception, consultation, policy formulation, publication and submission of the Local Plan.

The council's Proposed Submission Local Plan and supporting documents, including the Sustainability Appraisal and Consultation Statement, were published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for a six-week consultation period lasting from Friday 16th September until Friday 28 October 2016. The council consulted specific consultation bodies and other statutory bodies, local amenity and residents groups, businesses and individual residents through a variety of consultation methods, including letters and emails (please see [Appendix 2](#) below) with a copy of the Local Plan sent to the key statutory bodies. The Local Plan, Proposals Map changes document and the Sustainability Appraisal were made available to view at the Town Hall, Shepherds Bush Library, Fulham Library and Hammersmith Library during normal opening hours. The Local Plan and supporting documents were published on the council's website, with a

news feature on the planning home page. A Public Notice ([Appendix 3](#) below) was also published in the local paper advertising the consultation.

### **Sustainability Appraisal**

***With particular regard to the Council's SA, could you confirm that the necessary consultation has been undertaken and point me to the evidence supporting this position? I am mindful of national advice (PPG) relating to the SA production process and Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004. Whilst I have noted the Council's Consultation Statement and KD5, I would be grateful for details of the Regulation 19 consultation, including letters/notification provided.***

In accordance with national PPG and the Environmental Assessment of Plans and Programmes Regulations 2004, the council has prepared and consulted on a Sustainability Appraisal (SA) to support the policies in the Local Plan. Details of the consultation undertaken at each stage of the SA process is detailed below and has been undertaken in line with Regulation 4 and 13 of the Environmental Assessment of Plans and Programmes Regulations 2004.

#### Sustainability Scoping Report Consultation

In 2014 the council prepared a Sustainability Scoping Report (KD9) which was published for a five-week consultation from 9 January to 13 February 2014. The Scoping Report was sent to the three statutory consultees with environmental responsibilities (Environment Agency, Historic England & Natural England) as well as neighbouring local authorities and other relevant stakeholders for comment. The council invited comments on the scope and level of detail in the SA Scoping Report, with a number of specific consultation questions set out in the report (p.46) for further guidance. Representations were received from Natural England, the Environment Agency and Historic England, they can be found in Appendix 1 of the draft SA Report (KD13).

#### Regulation 18 Consultation

After consideration of the information in the SA Scoping report and the representations made to it, a draft SA (KD13) was prepared to support the draft Local Plan which included the consideration of alternative options. The draft Local Plan and supporting evidence documents including the draft SA were published for a six-week consultation (Regulation 18) from 9 January 2015 to 20 February 2015. Letters were sent to all statutory consultation bodies including the Environment Agency, Natural England and Historic England, with comments received from all three.

#### Regulation 19 Consultation

Following consultation on the draft Local Plan, a number of changes were made to the Local Plan policies. These changes resulted from consideration of consultation responses, updated national and regional

planning policy and new evidence gathered by the council. As a result of this, the policy assessments in the SA were reviewed and refreshed where necessary in line with the policies published in the Proposed Submission Local Plan (KD1). The Submission SA Report (KD8) and Non-Technical Summary (KD7) was published alongside the Proposed Submission Local Plan for a six-week consultation from 16 September to 28 October 2016. Letters including a copy of the Proposed Submission Local Plan were sent to the key statutory consultation bodies, with a copy of the SA and the Proposed Submission Local Plan sent to Natural England, Historic England and the Environment Agency. The council invited comments on the Local Plan, the Proposals Map changes document and the Sustainability Appraisal as well as any issues of a strategic cross boundary nature, soundness and legal compliance.

The Proposed Submission Local Plan and supporting evidence including the SA documents were also published on the council's website and made available to view at the Town Hall, Shepherd's Bush Library, Hammersmith Library and Fulham Library during normal opening hours. In terms of the SA consultation bodies, comments were received from Natural England, Historic England and the Environment Agency. A copy of the letter sent to the statutory consultation bodies including the Environment Agency, Historic England and Natural England at Regulation 19, can be found in [Appendix 2](#).

### **Pre-regulation engagement**

***In its document SD1, the Council mentions a pre-Regulation 18 engagement with stakeholders on issues and options for review that was undertaken from July to September 2013. Could you point me to, or supply, the details of that engagement please?***

This first stage of consultation for the Local Plan review ran from July to September 2013. This consultation was in advance of Regulation 18 consultation as required by the Town and Country Planning (Local Planning) (England) Regulations 2012. The council especially sought comments on the way forward for the Park Royal/Old Oak area in the document "Old Oak A vision for the Future" and on other topics identified in a list of 'Issues and options for review'.

The council sent letters and emails to a variety of consultees advising of the council's proposed review of the Core Strategy and Development Management Local Plan and invited involvement in the "local plan" review process. The letter stated that the council would especially welcome comments on the way forward for the Park Royal/Old Oak area and on other topics, such as housing numbers and infrastructure needs, identified in the letter. However, consultees were also asked to identify other policies and issues that they thought required review and to put forward suggestions as to the scope of any policy changes that they wished to see.

An example of the letter sent out in July 2013 is included in Appendix 4 below. The list of consultees included organisations and businesses on the council's Local Plan mailing list, all businesses in the Park Royal/Old Oak area, London Boroughs and South East Councils.

The letter and email particularly advised consultees of a link to the draft Vision document for the Old Oak area that set out a possible way forward for the regeneration of this area. The letter sought views on this Vision and on options for regeneration.

The online details of this consultation can be found via the following link:  
[https://www.lbhf.gov.uk/sites/default/files/section\\_attachments/issues\\_and\\_options\\_for\\_review\\_tcm21-181499.pdf](https://www.lbhf.gov.uk/sites/default/files/section_attachments/issues_and_options_for_review_tcm21-181499.pdf)

### **Open Space**

***In relation to Open Space, I note that the Council's last audit was dated 2006. Whilst I also note various additional work has been undertaken in terms of updates and surveys these appear to have been prepared to support the earlier Core Strategy. Is there any further evidence to support the submitted Plan's approach to open space provision in line with national guidance or any further work planned which will revisit this matter?***

The NPPF, at paragraph 73, requires that:

*"Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area."*

The 2006 Open Space audit is considered to still provide a sufficiently robust picture of the supply of open space in the borough. However, there have been changes in quantity as well as in quality of existing parks since the study, and further changes have been approved or are proposed within the council's existing development plan and emerging Local Plan.

Where further changes, including improvements, have occurred to the council's open space stock, they have been published in a series of open space background papers (2008, 2010, 2015 and 2016), the most recent of which is the 2016 Open Space Background Paper (SD24). Section 8 of the 2016 Open Space Background Paper (SD24) outlines the results of a full review of all open spaces in the borough, taking into account all boundary changes that have taken place since the 2011 Core Strategy. This additional work is considered to supplement the open space audit and provide an up-to-date picture of open space provision in the borough, informing the Local Plan policies and enabling a thorough review of the open space designations on the proposals map (SD5), which are shown in the proposals map changes document (KD2).

Details of changes to open space have also been published each year in the council's annual monitoring reports. The 2014/2015 Annual Monitoring report has been submitted (SD8) and previous annual monitoring reports are available on the council website at:

<https://www.lbhf.gov.uk/planning/planning-policy/local-development-framework/spatial-planning-research>

In addition to the studies detailed above, the council has a Parks and Open Space Strategy 2008 -2018 (SD25). This strategy encompasses all public and private open spaces across the borough including parks, open spaces, housing open land and civic spaces. The Parks and Leisure department at the council have confirmed that they intend to review and replace this document in 2018.

The council consider that the studies, collectively, provide up-to-date information to support the Local Plan with regard to open space provision in the borough and meet the requirements of paragraph 73 of the National Planning Policy Framework (SD64).

### **Risk and Contingency**

***Whilst this may be a matter for further discussion at any Hearing session, can you clarify the approach that the Council adopts towards 'risk and contingency' within the Plan? I may be interested in due course to discuss the way in which the Council intends to monitor the delivery of the Plan and its relationship with necessary new infrastructure. Can you confirm when the Monitoring Report for 2015/16 will be available?***

The delivery and implementation chapter of the Local Plan (Section 4 – KD1) provides our approach towards ensuring that the strategy of the Plan is delivered, what the risks to it are and how they will be minimised. For example, this chapter outlines contingencies such as working with stakeholders and strategic partners, using the development management process and compulsory purchase powers, preparing planning frameworks for specific areas, considering viability, managing funding sources and infrastructure projects and applying monitoring and review mechanisms. In addition, the planning obligations and infrastructure chapter (Section 7 – KD1), together with the Infrastructure Delivery Plan (SD45) seek to ensure the co-ordination and delivery of the necessary infrastructure. We have also provided a monitoring framework in the Local Plan (Appendix 6 – KD1) which provides those indicators we intend to use to measure the success or otherwise of key policies in the Local Plan.

The Local Plan's Infrastructure Delivery Plan (SD45) sets out the main actions needed to achieve the Local Plan's aims and objectives. It assesses the most important of the relationships between the policies and proposals, examining who does what, recognising the key role of the Council as planning authority as well as an implementation agency in its own right. This will involve strong working and robust actions with the Council's full range of partners to deliver the levels of growth envisaged.



The Infrastructure Delivery Plan includes an infrastructure schedule which sets out the key pieces of infrastructure that will be required, including who the responsible parties are for their delivery, their indicative costs and funding sources (as far as we are able), and when we expect to be able to bring the infrastructure forward. This schedule is considered to be a working document and has been/will be updated regularly to help inform and justify the Council's Community Infrastructure Levy schedule (CIL) (SD46) and a planned future revision to this levy.

The delivery and implementation chapter (Section 4 – KD1) also highlights the risk of land ownership and funding in the delivery of the strategic sites. If these proposals are not being delivered, or delivered at a slower rate, discussions with developers and landowners will be held to highlight problems, which the Council will assist in resolving, for example through funding bids, investing in sites and trying to build consensus where there are various landowners. In the case of the Hammersmith Flyunder (Strategic Site HRA2 – KD1), which is a site that has potential risks to its delivery, the Council has undertaken a feasibility study (SD62) to establish its deliverability.

In addition to the delivery and implementation chapter, there are several examples in the Proposed Submission Local Plan that allude to potential contingency measures if the plan is not being delivered as intended. For example, a key assumption that has underpinned the Local Plan is the rate of economic growth. If the economy does not grow as forecast, this may inhibit the delivery of jobs and prosperity and with it the delivery of housing and employment land, and not enable the scale of development proposed in the borough to be achieved. In response to this, Local Plan Policy E1 (Section 6 – KD1), 'Providing for a range of Employment uses' states that when considering new employment floorspace or the extension of existing floorspace the council will take into account the Hammersmith and Fulham economic growth plan and the council's economic strategies.

Other policies in the plan are also drafted with an element of flexibility to deal with changing circumstances, for example the town and local centre policies, the employment policies and the community facilities policies (Section 6 – KD1) all include a consideration of marketing evidence to establish whether a change of use is viable.

With regard to housing, the London SHLAA 2013 (SD70) established the deliverability of sites in the site selection criteria and so sites are included where there is a measure of certainty about them coming forward. The council's 5 year Housing supply (SD13) has been reviewed regularly to make sure the pipeline of housing is updated with planning permissions and completions.

The council would be happy to discuss risk and contingency further at the hearings sessions. The council will make the 2015/2016 AMR available to the Inspector to help inform the examination.

## **Local Development Scheme**

### ***Has the LDS been updated to reflect the revised timescales of the Plan's submission for Examination?***

The council's Local Development Scheme (LDS) (KD12) was revised in May 2016 and identified submission of the Local Plan for Autumn/Winter 2016 and examination for early 2017. The LDS has not been updated to reflect the fact that submission actually occurred later, in February 2017. However, the council have maintained a revised timetable for the Local Plan in a prominent position on the Local Plan webpage ([www.lbhf.gov.uk/localplan](http://www.lbhf.gov.uk/localplan)) to communicate the revised timeframes for submission and examination.

### **Minor changes**

#### ***Finally, could the Council confirm whether it has considered the content of KD4 collectively and whether it remains of the view that the proposed changes are cumulatively minor?***

The council is of the opinion that the changes it has made to the proposed submission Local Plan September 2016 (KD1) as shown in the minor changes schedule (KD4) do not alter the thrust of the document and are minor or technical in nature.

The council considers that the changes, many of which seek to address the concerns that were raised by representors during consultation on the proposed submission Local Plan improve the clarity and legibility of the DPD.

The council would therefore like the Inspector to consider all the changes in minor changes schedule (KD4) when he considers the soundness/legal compliance of the DPD. In addition, the council would like to request, under section 20 (7C) of the Planning and Compulsory Purchase Act 2004 as amended) that the Inspector suggests any further modifications that he considers necessary.

## Appendix 1: Duty to Co-operate with Prescribed bodies within and outside the plan making process.

Organisation	Nature of co-operation	Outcomes
Greater London Authority (GLA)	<ul style="list-style-type: none"> <li>• Consulted during formal plan making stages.</li> <li>• Bespoke letters to duty to co-operate 'Prescribed bodies'</li> <li>• GLA response received at both Regulation 18 and Regulation 19 consultations.</li> <li>• Joint preparation of the White City Opportunity Area Framework SPD, including regular meetings and correspondence.</li> <li>• Joint preparation of Earls Court and West Kensington Opportunity Area Framework SPD (together with the Royal Borough of Kensington and Chelsea) including regular meetings and correspondence.</li> <li>• Collaborative consultation on the Old Oak and Park Royal Vision in September 2013.</li> <li>• Participation in the development of the London Plan further alterations and minor alterations and attendance at public examinations.</li> <li>• Attendance and participation at the GLA DtC FALP consultation Event March 2014</li> <li>• Attendance and participation at the GLA DtC Wider South East consultation event June 2014</li> <li>• Participation and engagement in the development of the Safeguarded Wharves review 2013.</li> <li>• Participation and engagement in the London Plan review workshops 2016.</li> <li>• Response made to consultation on 'A City for Londers' vision document in 2016.</li> <li>• Response made to consultation on 'Homes for Londoners' the GLA affordable housing and viability SPG 2017.</li> <li>• Attendance at GLA policy meetings on various topic areas including Housing, Waste, Town centres and Industrial Land.</li> <li>• Contribution and participation in the GLA Town Centre Health Checks 2013 and 2016.</li> <li>• Collaboration and input into the London SHLAA 2013.</li> <li>• Collaboration and input into the London SHMA 2014</li> <li>• Participation in the 2016 GLA 'Call for Sites'</li> </ul>	<p>Minor changes made to the Proposed Submission Local Plan to take account of GLA responses – see minor changes: MC58, MC209, MC175, MC163, MC87, MC90, MC91, MC70, MC71, MC198, MC199, MC200, MC94, MC31</p> <p>GLA response to Regulation 19 consultation included confirmation that the Local Plan is in general conformity with the London Plan.</p> <p>Adoption of White City Opportunity Area Planning Framework SPD</p> <p>Adoption of Earls Court and West Kensington Opportunity Area Framework SPD.</p>

	<ul style="list-style-type: none"> <li>• Response provided on the 2017 SHLAA methodology.</li> <li>• SHLAA 2017 borough meeting arranged for April 2017.</li> <li>• Ongoing Contribution to the London Development Database.</li> <li>• Fortnightly duty to Co-operate meetings with the OPDC (Mayoral Development Corporation)</li> <li>• Ongoing engagement and review of all OPDC Local Plan evidence base and policies.</li> </ul>	
The Environment Agency	<ul style="list-style-type: none"> <li>• Consulted during formal plan making stages</li> <li>• Bespoke letter to duty to co-operate 'Prescribed bodies'</li> <li>• Environment Agency response received at both Regulation 18 and Regulation 19 consultations.</li> <li>• Early discussion on preparation of SFRA and SWMP</li> <li>• Formal consultation with EA on SFRA and SWMP documents</li> <li>• Environment Agency response on Draft Strategic Flood Risk Assessment</li> <li>• Attend regular meetings such as the DRAIN London/LoDEG meetings with other London Borough representatives and the EA (quarterly meetings)</li> <li>• Member of the North Central Flood Partnership Group along with other local authorities and representatives from the EA (quarterly meetings)</li> <li>• Submit progress reports to the EA (mostly annual reviews) where we identify the status and progress with flood risk management responsibilities, including preparation</li> <li>• Adhoc 1 to 1 meetings with EA officers to discuss specific issues or projects such as the development of Flood related Strategies.</li> <li>• Participation in an Environment Agency event to highlight the importance of the Thames Estuary 2100 Plan (TE2100)</li> </ul>	<p>All flood risk work areas are discussed in these meetings and updates are provided on progress of key projects and plans such as the Strategic Flood Risk Assessment (SFRA) and Surface Water Management Plan (SWMP).</p> <p>The EA considered that the draft SFRA was sound. Minor changes have been made to the Proposed Submission Local Plan to take account of the EA's response – see minor changes: MC169, MC170, MC174, MC122</p>
Historic England (formerly English Heritage)	<ul style="list-style-type: none"> <li>• Consulted during formal plan making stages</li> <li>• Bespoke letter to duty to co-operate 'Prescribed bodies'</li> <li>• Historic England response received on the Local Plan at both Regulation 18 and Regulation 19 consultations.</li> <li>• Statement of common ground meeting arranged for 11th April</li> </ul>	<p>Minor changes have been made to the Proposed Submission Local Plan to take account of Historic England's responses – see minor changes: MC215, MC18, MC19, MC155, MC156, MC157, MC158, MC159, MC160,</p>

	<p>2017.</p> <ul style="list-style-type: none"> <li>• Engagement on impacts of redevelopment proposals of Stamford Bridge for Chelsea FC</li> <li>• Discussions on Hammersmith Town Centre masterplan</li> <li>• Discussions on impact of Landmark House proposal on setting of heritage assets and riverside</li> <li>• Joint meetings with EA and OPDC officers on early planning (pre) applications on sensitive sites, OPDC Design Review Panel (Cabe) meetings and on various studies produced by OPDC to inform the Local Plan process.</li> <li>• Ongoing discussions in relation to heritage assets on the Historic England Heritage at Risk Register and input to annual update</li> <li>• Joint working to secure Historic England grant funding and match funding for restoration of listed cemetery mausolea on the Heritage at Risk Register, with two projects currently onsite</li> <li>• Ongoing discussions on potential listings</li> <li>• Non-site specific discussions on policy and good practice</li> <li>• Significant input on proposals for Fulham Town Hall – both during application stage and at Public Inquiry.</li> <li>• Engagement on floodlighting and structural repair and refurbishment of Hammersmith Bridge.</li> <li>• Discussions on window replacement programme for schools</li> </ul>	<p>MC123, MC23, MC24, MC28, MC53, MC51, MC52.</p>
Natural England	<ul style="list-style-type: none"> <li>• Consulted during formal plan making stages</li> <li>• Bespoke letter to duty to co-operate 'Prescribed bodies'</li> <li>• Natural England response received to the Local plan at both Regulation 18 and Regulation 19 consultations.</li> <li>• Natural England was involved in scoping the Sustainability Appraisal to ensure mutual agreement on the process.</li> <li>• Regular consultation on planning applications in the Borough.</li> </ul>	<p>Minor change made to the Proposed Submission Local Plan to take account of Natural England response – see minor change: MC171</p>
The Civil Aviation Authority	<ul style="list-style-type: none"> <li>• Consulted during formal plan making stages</li> <li>• Bespoke letter to duty to co-operate 'Prescribed bodies'</li> <li>• Met with CAA, DfT and other</li> </ul>	<p>The CAA is a statutory consultee and is consulted on all the Council's planning policy documents, including the</p>

	<p>borough officers and London Heliport representatives in October 2016 to discuss Heliport safeguarding issues</p> <ul style="list-style-type: none"> <li>• Considered the CAA's proposed changes to the heliport safeguarding arrangements and provided comments (November 2016) on our preferences and the implications of the changes</li> <li>• Noted the CAA's requirements to consult the heliport on planning applications in those parts of H&amp;F that fall within the designated safeguarding area</li> <li>• Maintain an open channel of communication with our CAA contact (Inez Bartolo, Principal Inspector – Aerodromes)</li> </ul>	<p>Local Plan. Other than those listed, it was not thought to be necessary to hold specific duty to co-operate meetings or other engagement activities beyond the normal statutory consultation procedures with the CAA.</p> <p>The CAA have not made representations to the Local Plan.</p> <p>The council note the need to add the recent heliport safeguarding, issued by the CAA, to the Local Plan Proposals Map – see minor change MC222.</p>
The Homes and Communities Agency	<ul style="list-style-type: none"> <li>• Consulted during formal plan making stages</li> <li>• Bespoke letter to duty to co-operate 'Prescribed bodies'</li> </ul>	<p>The HCA is a statutory consultee and is consulted on all the Council's planning policy documents, including the Local Plan. It was not thought to be necessary to hold specific duty to co-operate meetings or other engagement activities beyond the normal statutory consultation procedures with the HCA.</p> <p>The HCA have not made representations to the Local Plan.</p>
Clinical Commissioning Group	<ul style="list-style-type: none"> <li>• Consulted during formal plan making stages</li> <li>• Bespoke letter to duty to co-operate 'Prescribed bodies'</li> <li>• Duty to co-operate meetings every 6 months.</li> <li>• CCG commented on the Local Plan at both regulation and regulation 19 consultations</li> <li>• Collaboration on the Infrastructure Delivery Plan September 2016.</li> </ul>	<p>Infrastructure Delivery Plan published with suggested changes from the CCG.</p> <p>Minor changes made to the Proposed Submission Local Plan to take account of the CCG response – see minor changes: MC9, MC201</p>
The Office of Rail Regulation	<ul style="list-style-type: none"> <li>• Consulted during formal plan making stages</li> <li>• Bespoke letter to duty to co-operate 'Prescribed bodies'</li> </ul>	<p>The Office of the Rail Regulation is a statutory consultee and is consulted on all the Council's planning policy documents, including the Local Plan. It was not thought to be necessary</p>

		to hold specific duty to co-operate meetings or other engagement activities beyond the normal statutory consultation procedures with this Office.
Transport for London	<ul style="list-style-type: none"> <li>• Consulted during formal plan making stages</li> <li>• Bespoke letter to duty to co-operate 'Prescribed bodies'</li> <li>• TfL and TfL property responses received at Regulation 18 and Regulation 19 consultations.</li> <li>• Joint preparation of the White City Opportunity Area Framework SPD</li> <li>• Joint preparation of Earls Court and West Kensington Opportunity Area Framework (together with the Royal Borough of Kensington and Chelsea.</li> <li>• Westtrans [part of west London alliance] quarterly liaison meetings followed by TfL panel update. Most recently 9.3.17 papers available</li> <li>• TfL planning quarterly meetings. Most recently 27.3.17 not minuted.</li> <li>• Annual Bus network and priority meeting. Most recently 20.3.17 papers available.</li> <li>• Quarterly TfL local implementation plan meetings. Most recently 21.3.17 not minuted</li> <li>• Quarterly TfL borough [traffic signals] operations board. Most recent 22.2.17 papers available</li> <li>• Quarterly OPDC transport board. Most recent meeting late 2016 [board currently under review due to new Mayor]</li> <li>• Quarterly HS2 highways sub group [of Planning Forum]. Most recent meeting 29.3.17</li> <li>• Better Junctions [Hammersmith Broadway] cycling major project weekly joint project team meetings</li> <li>• Cycle Superhighway 9 monthly joint project team meetings</li> <li>• East Acton Quietway cycling project monthly joint project team meetings</li> <li>• Public Transport Liaison Meetings with TfL, joint with RBKC, three times per year</li> <li>• Ad hoc meetings with TfL, e.g. when significant bus service changes are proposed. (Most recently in relation to</li> </ul>	Minor changes made to the Proposed Submission Local Plan to take account of GLA and TfL response – see minor changes: MC58, MC209, MC175, MC163, MC87, MC90, MC91, MC70, MC71, MC198, MC199, MC200, MC94, MC31

	<p>Hammersmith Bridge).</p> <ul style="list-style-type: none"> <li>• Hammersmith Bridge Steering Group which TfL are on.</li> </ul>	
Highways England (formerly The Highways Agency)	<ul style="list-style-type: none"> <li>• Consulted during formal plan making stages</li> <li>• Bespoke letter to duty to co-operate 'Prescribed bodies'</li> <li>• A representation was received from the Highways Agency in response to the Regulation 18 consultation regarding the proposals for significant Regeneration Areas including new homes and accompanying employment.</li> </ul>	<p>Comments made at regulation 18 consultation have been noted.</p> <p>No representations were received from the Highways Agency at regulation 19 consultation.</p>
Marine Management Organisation	<ul style="list-style-type: none"> <li>• Consulted during formal plan making stages</li> <li>• Bespoke letter to duty to co-operate 'Prescribed bodies'</li> </ul>	<p>The Marine Management Organisation is a statutory consultee and is consulted on all the Council's planning policy documents, including the Local Plan. It was not thought to be necessary to hold specific duty to co-operate meetings or other engagement activities beyond the normal statutory consultation procedures with this Office.</p> <p>No representations were received from the Marine management Organisation.</p>



## Appendix 2: Regulation 19 consultation letter sent to statutory bodies

London Borough of Hammersmith & Fulham  
Planning Division, Planning and Development Department  
Hammersmith Town Hall Extension, King Street, W6 9JU  
Tel: 020 8753 3384  
Email: [localplan@lbhf.gov.uk](mailto:localplan@lbhf.gov.uk)  
Web: [www.lbhf.gov.uk/localplan](http://www.lbhf.gov.uk/localplan)



16<sup>th</sup> September 2016

North London Planning Team  
Environment Agency (London Team)  
Ergon House  
Horseferry Road  
London  
SW1P 2AL

Dear Sir/Madam

### Proposed Submission Local Plan (Regulation 19) Consultation – Hammersmith and Fulham

Hammersmith and Fulham Council is currently consulting on a Proposed Submission Local Plan which outlines the Council's vision and proposed policies for development in the borough for the next 15- 20 years, including the identification of four key regeneration areas, strategic sites for development and proposed policies on topics such as housing and the built environment. The Council is also consulting on Proposals Map changes and an Environmental Report (Sustainability Appraisal) which accompany the Proposed Submission Local Plan.

The Council is keen to ensure that anyone with an interest in the borough has the opportunity to comment on the Proposed Submission Local Plan. In accordance with the Localism Act (2011) and the National Planning Policy Framework (para 178), the Council has a Duty to Co-operate with bodies prescribed under Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on planning issues that cross administrative boundaries, particularly those that relate to strategic matters. As one such body, the Council would welcome any comments you may have regarding issues of a strategic cross-boundary nature, soundness and legal compliance.

The Proposed Submission Local Plan and associated documents can be viewed on the council's website at [www.lbhf.gov.uk/localplan](http://www.lbhf.gov.uk/localplan). To make comments on these documents please use one of the following methods:

- Online: [www.lbhf.gov.uk/localplan](http://www.lbhf.gov.uk/localplan)
- Email: [localplan@lbhf.gov.uk](mailto:localplan@lbhf.gov.uk)
- Letter: Development Plans Team, Planning Division, Planning and Development Department, Hammersmith Town Hall Extension, King Street, W6 9JU

Please send any comments you have on the Proposed Submission Local Plan and associated documents by 5pm on 28<sup>th</sup> October 2016.

If you require further information about the Proposed Submission Local Plan please contact us or visit our website. We look forward to hearing from you.

Yours sincerely



David Gawthorpe, Deputy Team Leader,  
Development Plans  
Policy and Spatial Planning

## Appendix 3: Regulation 19 Consultation Public Notice

London Borough of Hammersmith and Fulham

### NOTICE OF PUBLIC CONSULTATION (Proposed Submission Local Plan)

*Planning and Compulsory Purchase Act 2004 and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 – Proposed Submission Local Plan for the London Borough of Hammersmith and Fulham*

Notice is hereby given, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 that the London Borough of Hammersmith and Fulham has produced a Proposed Submission version of the Hammersmith and Fulham Local Plan for consultation.

**(a) Title of Document:**

The Hammersmith and Fulham Proposed Submission Local Plan

**(b) Subject Matter:**

The Proposed Submission Local Plan sets out the vision, objectives and detailed spatial strategy for future development in Hammersmith and Fulham for the next 15-20 years along with specific development management policies. It is accompanied by changes to the adopted Proposals Map and a Sustainability Appraisal. During this formal consultation stage, we are particularly seeking comments on whether or not you find the Proposed Submission Local Plan to be 'sound' and legally compliant, including whether it is:

1. Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
2. Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
3. Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
4. Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

**(c) Period within which representations may be made:**

Friday 16th September 2016 to 5.00pm Friday 28<sup>th</sup> October 2016.

**d) How to comment**

To make comments on the Local Plan and associated documents please use one of the following methods, providing your name and contact details:

- Online: [www.lbhf.gov.uk/localplan](http://www.lbhf.gov.uk/localplan)
- Email: [localplan@lbhf.gov.uk](mailto:localplan@lbhf.gov.uk)
- Letter: Development Plans Team, Planning Division, Planning and Development Department, Hammersmith Town Hall Extension, King Street, W6 9JU

The Proposed Submission Local Plan, changes to the adopted Proposals Map and the Sustainability Appraisal may be viewed on the council's website: [www.lbhf.gov.uk/localplan](http://www.lbhf.gov.uk/localplan) or at:

- Hammersmith Town Hall Extension, First Floor, Environment Reception (Duty Planner Office), King Street, London, W6 9JU (9am to 5pm Monday to Friday)
- and at the borough's reference libraries: Fulham Library (SW6 5NX) Opening Hours: Sunday 11am - 5pm, Monday - Thursday 10am - 8pm, Friday - Saturday 10am - 5pm. Hammersmith Library (W6 7AT) Opening Hours: Sunday 11am - 5pm, Monday - Thursday 10am - 8pm, Friday - Saturday 10am - 5pm. Shepherds Bush Library (W12 7BF) Opening Hours: Sunday 11am - 5pm, Monday - Friday 10am - 8pm, Saturday 10am - 5pm.

The documents may also be requested by phoning 020 8753 3384 or emailing [localplan@lbhf.gov.uk](mailto:localplan@lbhf.gov.uk)

## Appendix 4: Local Plan Review letter 2013

London Borough of Hammersmith & Fulham  
Planning Division, Transport and Technical Services  
Hammersmith Town Hall, King Street, W6 9JU  
Tel: 020 8753 1084  
Email: [tdt@lbhf.gov.uk](mailto:tdt@lbhf.gov.uk)  
Web: [www.lbhf.gov.uk](http://www.lbhf.gov.uk)

28<sup>th</sup> June 2013

Dear Sir/Madam,

Trevor Harvey ext. 3039

### LOCAL PLAN REVIEW 2013

I am writing to let you know about the first stage of the council's proposed review of the Local Plan and to invite your involvement in this review process.

The council's Core Strategy which is part of its Local Plan was adopted in October 2011. This document, together with the supporting Development Management Local Plan and the Planning Guidance and Regeneration Area Supplementary Planning Documents, generally provide a sound basis for sustainable development of the borough. However, Government proposals affecting railways will impact particularly on the north of the borough, in the Park Royal/Old Oak area and have led the council to conclude that it is the right time to review the Core Strategy.

In this first stage of consultation for the Local Plan review we would especially welcome comments on the way forward for the Park Royal/Old Oak area and on the other topics identified overleaf. However, we would also like you to identify other policies and issues that you think require review and to suggest the scope of any policy changes that you put forward.

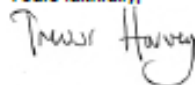
Written comments on the proposed Local Plan review (detailed overleaf) can be made online at <http://lbhf.limehouse.co.uk/portal/> or sent by email or post to:

- Email address: [localplan@lbhf.gov.uk](mailto:localplan@lbhf.gov.uk)
- Post address: Trevor Harvey, LB Hammersmith and Fulham, Development Plans Team, Planning Division, Town Hall Extension, King Street, London W6 9JU

**Comments must be made by 6<sup>th</sup> September 2013.** The council will consider all comments it receives during this consultation before it consults on a more detailed Local Plan Review document.

Please contact the Development Plans if you have any queries concerning this letter.

Yours faithfully,



Trevor Harvey  
Team Leader, Development Plans  
Planning Division, Transport & Technical Services Department  
Hammersmith and Fulham Council  
Nigel Pallace - Executive Director, Transport & Technical Services, London Borough of Hammersmith & Fulham & Royal Borough Kensington and Chelsea